

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MODIFICATION OF MAIL CLASSIFICATION
SCHEDULE REGARDING FIRST-CLASS MAIL
SINGLE-PIECE RESIDUAL PRICE TABLE

Docket No. MC2013-30

RESPONSE OF UNITED STATES POSTAL SERVICE
TO MAILER COMMENTS
(February 6, 2013)

The United States Postal Service hereby responds to the Comments of the Association for Postal Commerce and the Further Comments of the National Postal Policy Council and the Major Mailers Association. Both pleadings ask the Commission to reject the Postal Service's proposed MCS changes. The mailer comments claim that the MCS changes are inconsistent with the intent of the new blended 48-cent rate, as stated in Docket No. R2013-1.¹ This is simply not the case. Rather, the proposed MCS language attempts only to clarify when retail single-piece prices (rather than the new 48-cent rate) apply to residual pieces from presort mailings. As the Postal Service explained in response to Chairman's Information Request No. 1, question 9, the proposed MCS change in this docket does not alter the application of the blended 48-cent rate introduced in Docket No. R2013-1.²

The Postal Service filed clarifying MCS language after some mailers expressed an intention to separate residual pieces into 1-ounce mailings (entered at the retail single-piece price of 46-cents) and 2-ounce mailings, entered as residuals with a mixed-weight Presort

¹ Comments of the Association for Postal Commerce, at 2 (February 4, 2013); Further Comments of the National Postal Policy Council and the Major Mailers Association, at 1 (February 5, 2013).

² Response of the United States Postal Service to Chairman's Information Request No. 1, at 10-11 (January 18, 2013).

mailing, at the 48-cent rate. Such a scenario would be inconsistent with the aim and financial justification of the 48-cent price, which assumed that all 1-ounce and 2-ounce residuals would be entered using the 48-cent price.³

As the Commission stated, and the Postal Service confirmed, in question 3(c) of Commission's Information Request No. 1:

as of January 27, 2013, a mailer will have two options for mixed-weight residual pieces from a First-Class presort letter mailing: (1) separate the one-ounce from the two-ounce residual pieces and pay the applicable Single-Piece First-Class Mail rates, or; (2) pay the 48-cent residual rate for all residual pieces weighing up to two ounces.

The MCS changes proposed in this docket (as presented in response to Chairman's Information Request No. 1, question 4 (January 18, 2013)) seek only to ensure that the two options presented in question 3(c) are more clearly reflected in the MCS.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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³ See, Docket No. R2013-1, United States Postal Service Notice of Market-Dominant Price Adjustment, at 15-16 (October 11, 2012). But see the Postal Service's response to Chairman's Information Request No. 1, question 8 (January 18, 2013), which notes that the Postal Service now expects that the single-piece price will be used for 1-ounce residuals from a pure 1-ounce Presort mailing.